

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG
RESOURCES (GUINEA) SARL, and BSG
RESOURCES LIMITED,

Plaintiffs,

v.

GEORGE SOROS, OPEN SOCIETY
FOUNDATIONS, OPEN SOCIETY INSTITUTE,
FOUNDATION TO PROMOTE OPEN
SOCIETY, OPEN SOCIETY FOUNDATION,
INC., ALLIANCE FOR OPEN SOCIETY
INTERNATIONAL INC., OPEN SOCIETY
POLICY CENTER, and OPEN SOCIETY FUND,

Defendants.

No. 1:17-cv-02726 (JFK) (AJP)

Oral Argument Requested

NOTICE OF MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO STAY

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support Defendants' Motion to Dismiss Plaintiffs' Amended Complaint or, in the Alternative, Stay the Action; the Declaration of James Fitzmaurice in Support of the Defendants' Motion to Dismiss Plaintiffs' Amended Complaint or, in the Alternative, Stay the Action; and all prior papers and proceedings herein, the Defendants will move this Court, before the Honorable John F. Keenan, at the United States Courthouse, 500 Pearl Street, Room 20C, New York, New York 10007, for an order, pursuant to Federal Rules of Civil Procedure 8(a)(2), 9(b), 12(b)(2), 12(b)(4), 12(b)(5), and 12(b)(6), dismissing the Amended Complaint with prejudice, or, in the alternative, for a stay and for such other and further relief as this Court may deem just and proper.

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PLEASE TAKE FURTHER NOTICE that, pursuant to Judge Keenan's Order, dated July 7, 2017 (Dkt No. 30), Plaintiffs shall serve any papers in opposition on or before August 18, 2017, and Defendants shall serve any reply no later than September 8, 2017.

Dated: July 28, 2017
New York, New York

WILLKIE FARR & GALLAGHER LLP

By: /s/ Joseph T. Baio
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James E. Fitzmaurice

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